

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS SECKAR TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T2-10
AND OCA/USPS-T3-26 REDIRECTED FROM WITNESS STIREWALT)

The United States Postal Service hereby provides the response of witness Seckar to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T2-10, filed on August 20, 1998; and OCA/USPS-T3-26, filed on August 21, 1998, and redirected from witness Stirewalt.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

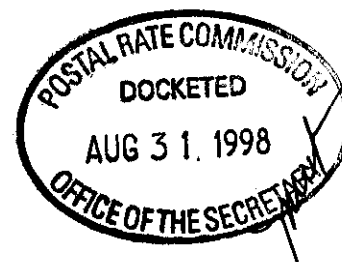
By its attorneys:

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August 31, 1998



RESPONSE OF POSTAL SERVICE WITNESS SECKAR TO INTERROGATORY
OF OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T2-10. Please refer to USPS-T-2, Exhibit A, Table 4.

- a. Please confirm that the average number of impressions per piece is 6.7823 (2,005,301,751 / 295,665,025). If you do not confirm, please explain.
- b. Please confirm that only one impression can be made on one side of a page. If you do not confirm, please explain.
- c. Please confirm that for a one page piece, the number of impressions will be either one or two. If you do not confirm, please explain.
- d. Please confirm that a piece with an average of 6.7823 impressions would have from four up to (and including) seven pages. If you do not confirm, please explain.

RESPONSE:

- a. Confirmed.
- b. Confirmed, but only under the condition that the page is 8.5x11 or 8.5x14. If the page is 11x17, two impressions are made on one side of the page.
- c. Confirmed, but only under the condition that the piece is either 8.5x11 or 8.5x14. For a one page piece that is 11x17 (which is duplex, see Tr. 2/692), the number of impressions will be four.
- d. Confirmed, but only under the assumption that the piece is 8.5x11 or 8.5x14. An 11x17 piece with 6.7823 impressions would have between one and two pages.

RESPONSE OF POSTAL SERVICE WITNESS SECKAR TO INTERROGATORY
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STIREWALT

OCA/USPS-T3-26. Please refer to the table below.

1999

	[a]	[b]
Black & White 8.5x11 & 8.5x14		
Information Systems - Variable	\$710,294	\$9.90
Information Systems - Fixed	\$379,097	\$5.28
Cost per Transaction		\$15.18
Black & White 11x17		
Information Systems - Variable	\$199,401	\$2.78
Information Systems - Fixed	\$106,424	\$1.48
Cost per Transaction		\$4.26
Spot Color 8.5x11 & 8.5x14		
Information Systems - Variable	\$648,929	\$9.04
Information Systems - Fixed	\$346,346	\$4.83
Cost per Transaction		\$13.87
Total Transactions per Year [c]		71,772

NOTES AND SOURCES:

[a] USPS-T-2, Exhibit A, Table 1.

[b] [a] / [c]

[c] USPS-LR-1/MC98-1, Attachment 1, at 6. 71,772 = 5,981
users x 12 average customer sessions per user per year

Please confirm that the cost per transaction for Black & White 8.5x11 & 8.5x14, Black & White 11x17, and Spot Color 8.5x11 & 8.5x14 is \$15.18, \$4.26 and \$13.87, respectively. If you do not confirm, please explain and provide the correct cost per transaction.

RESPONSE:

I do not confirm the costs per transaction for the three print streams as displayed in the above table. The number of transactions is not detailed at the print stream level. Print stream costs per total annual transactions are not meaningful, and while the total numbers of users and sessions per user are useful for the

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OCA/USPS-T3-26, Page 2 of 2

calculations witness Stirewalt makes, they should not be used to derive print stream-specific information systems costs on a unit, in this case transaction, basis. The correct unit for associating costs, information systems costs in this case, with unique print streams is impressions.

DECLARATION


I, Paul G. Seckar, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Paul G Seckar

Dated: 8/31/98

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



David H. Rubin

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